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Attorneys for Defendant
MIGUEL ANGEL SALAS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ANGEL SALAS, et al,

Defendants.

Case No. CR-17-283-EMC

**STIPULATION AND PROPOSED
ORDER CONTINUING STATUS
DATE FROM JULY 12, 2017 to
AUGUST 23, 2017; ~~PROPOSED~~
ORDER RE: EXCLUDABLE TIME
UNDER THE SPEEDY TRIAL ACT**

The parties agree and stipulate as follows:

1. Defendants Miguel Salas and Samuel Meza are currently scheduled to appear before the Court for a status conference on July 12, 2017 at 2:30 p.m.

2. Both Messrs. Salas and Meza are on bond and out of custody. (See Dkt. Items 7 and 12.)

3. Defense counsel received an initial round of discovery on June 19, 2017, consisting of approximately 150 bates stamped pages and thirteen audio recordings of varying length.

4. Counsel for Mr. Salas, Peter L. Arian, has a scheduling conflict due to trial in the matter of *People v. Jerry Coneal III*, San Mateo County Case SC080432A. Trial

1 in Mr. Coneal's case, a special circumstance murder trial, is expected to last four to six
2 weeks and begins on July 10, 2017.

3 5. Due to counsel's unavailability and the defendant's status on bond, the
4 parties jointly request a continuance of the status hearing to August 23, 2017 at 2:30
5 p.m.

6 6. The parties agree that an exclusion of time is appropriate under the Speedy
7 Trial Act between July 12, 2017 and August 23, 2017, for the purposes of the effective
8 preparation of counsel. The parties also agree that the ends of justice served by granting
9 such a continuance outweigh the best interests of the public and the defendant in a
10 speedy trial. (18 U.S.C. § 3161(h)(7)(A).

11 Respectfully submitted,

12
13 DATED: July 6, 2017

By /s/ Peter L. Arian

14 PETER L. ARIAN
15 Attorney for MIGUEL SALAS

16 DATED: July 6, 2017

By /s/ Geoffrey A. Hansen

17 GEOFFREY A. HANSEN
18 Assistant Federal Public Defender
Attorney for SAMUEL MEZA

19 DATED: July 6, 2017

By /s/ Nikhil Bhagat

20 NIKHIL BHAGAT
21 Assistant United States Attorney
22 Attorney for the United States
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CONTINUING STATUS DATE
FROM JULY 12, 2017 to AUGUST 23,
2017 AND PROPOSED ORDER RE:
EXCLUDABLE TIME UNDER THE
SPEEDY TRIAL ACT

Pursuant to the parties' stipulation, the Court orders that the status conference currently set for July 12, 2017 be continued to August 23, 2017. The Court also finds that the exclusion of the period from July 12, 2017 to August 23, 2017 from the time limits applicable under 18 U.S.C. § 3161 is warranted; that the ends of justice served by the continuance outweigh the interests of the public and the defendant in the prompt disposition of this criminal case; and that the failure to grant the requested exclusion of time would deny counsel for the defendant and for the government the reasonable time necessary for effective preparation and of counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice. See 18 U.S.C. § 3161(h)(7)(B)(iv).

DATED: July 7, 2017

